

WHITE & CASE LLP
1155 Avenue of the Americas
New York, New York 10036-2787
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
Gerard Uzzi (GU – 2297)
J. Christopher Shore (JS – 6031)

Attorneys for the Ad Hoc Group
of Lehman Brothers Creditors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : **Chapter 11 Case No.**
: **LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**
: **Debtors.** : **(Jointly Administered)**
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**SUPPLEMENTAL VERIFIED STATEMENT OF THE AD HOC GROUP OF
LEHMAN BROTHERS CREDITORS PURSUANT TO
BANKRUPTCY RULE 2019**

Gerard Uzzi, verifies as follows:

1. I am a member of the law firm of White & Case LLP (“White & Case”). I am admitted to practice in the States of New York, New Jersey and Florida, as well as in the United States District Courts for the Southern and Eastern Districts of New York, the District of New Jersey and the District of Colorado. I am authorized to make this supplemental statement (the “Supplemental Statement”) on behalf of the Ad Hoc Group of Lehman Brothers Creditors (the “Group” and the members thereof, the “Group Members”).

2. On April 18, 2011, the Court entered an order [Docket No. 16107], directing the Group to comply with the requirements of Rule 2019. On April, 22, 2010, the Group submitted, as good faith compliance with the Court’s direction, the Verified Statement of the Ad Hoc Group of Lehman Brothers Creditors Pursuant to Bankruptcy Rule 2019 (the “Statement”) [Docket No.

16222]. By the Statement, the Group indicated that only summary information was provided with respect to Pacific Investment Management Company LLC (“PIMCO”), but that additional details as to PIMCO would be submitted once compiled. This Supplemental Statement sets forth such additional information.

3. Specifically, the schedule attached hereto as Annex A contains, with respect to PIMCO, the following categories of information, which the Group in good faith believes meet, at least at a minimum, the disclosure requirements set forth in Rule 2019:

- the amount of claims against and interests in the Debtors and certain of their material affiliates that may be voted by PIMCO (as determined utilizing the guidelines set forth in paragraph 4 of this Supplemental Statement) as of March 31, 2011;¹
- the time of acquisition of each such claim or interest;
- the nature of such claims and interests; and
- the amounts of claims or interests in accounts managed, and that may be voted, by PIMCO, the times when acquired, the amounts paid therefor, and any sales or other disposition thereof.

4. In connection with preparing the Statement, the Group made certain assumptions or otherwise followed certain guidelines. These include the following items:

- the claims listed include those claims for which a Group Member holds the beneficial ownership of such claim, or otherwise has investment authority, contractual authority or voting authority with respect to such claim;
- where a claim would otherwise be denominated in a foreign currency, such claim has been converted to U.S. Dollars using the exchange rate as of September 15, 2008;²
- for claims based on notes, the original face amount of the notes has been listed

¹ For the purpose of making this Supplemental Statement, the “material affiliates” are Lehman Brothers Inc., Lehman Brothers Bankhaus AG (in Insolvenz), Lehman Brothers International (Europe), Lehman Brothers Treasury Co. B.V., and Lehman Brothers Finance AG.

² In particular, the Group used the following exchange rates for the purpose of preparing the Statement: (1) 0.009555 USD per JPY; (2) 1.4243 USD per EUR; (3) 1.8007 USD per GBP; (4) 0.9424 USD per CAD; (5) 0.8917 USD per CHF; (6) .1282 USD per HKD; and (7) 0.8066 USD per AUD.

- without regard to any accrued interest;
- for claims based on a derivative contract, the amount as stipulated with the Debtors is listed if such claims have in fact been stipulated, otherwise the amount as set forth on the applicable proof of claim is listed;
 - where a guarantee claim was acquired with the underlying primary claim and no separate allocation was made with respect to the purchase price, the aggregate purchase price is listed with the underlying primary claim and “UDT” or “undetermined” is listed with the associated guarantee claim; and
 - where a claim based on a derivative contract is the result of a prepetition derivative contract between a Group Member and the Debtors or one of their affiliates, the termination date is listed as the time “acquired.”

In preparing this Supplemental Statement, the Group has made the same assumptions and has followed the same guidelines to the extent such assumptions or guidelines are relevant.

5. By the Statement, the Group also indicated that the Steering Committee (as defined in the Statement) is comprised of Canyon Capital Advisors LLC, Fir Tree, Inc., Paulson & Co. Inc. and Taconic Capital Advisors L.P. To memorialize this, the members of the Steering Committee have executed an Addendum to the Second Amended and Restated Agreement of the Ad Hoc Group of Lehman Brothers Creditors, the form of which is attached hereto as Annex B.

6. The provision of the information contained in this Supplemental Statement is not intended and should not be construed to be (i) a waiver or release of any claims against or interests in the Debtors or their affiliates held by any of the Group Members, their affiliates or any other entity, (ii) an admission with respect to any fact or legal theory, or (iii) an amendment to or restatement of any proof of claim filed against the Debtors or any of their affiliates.

7. I verify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. The source of my knowledge with respect to the information contained in Annex A is communications with PIMCO by myself or persons acting at my direction. The source of my knowledge with respect to the information contained herein and in

Annex B is a review of certain documents by myself or persons acting at my direction and my general knowledge of this matter.

Dated: May 13, 2011
New York, New York

Respectfully submitted,

WHITE & CASE LLP
1155 Avenue of the Americas
New York, New York 10036-2787
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
Gerard Uzzi (GU - 2297)
J. Christopher Shore (JS - 6031)

By: /s/ Gerard Uzzi
Gerard Uzzi

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